

Attachment C: Statistical Analysis for Metals Effluent Data ($N \geq 10$)

EPA bases its determination of “reasonable potential” on a characterization of the upper bound of expected effluent concentrations based on a statistical analysis of the available monitoring data. As noted in the *Technical Support Document for Water Quality Based Toxics Control* (EPA 1991) (“TSD”), “[a]ll monitoring data, including results for concentrations of individual chemicals, have some degree of uncertainty associated with them. The more limited the amount of test data available, the larger the uncertainty.” Thus with a limited data set, the maximum concentration that has been found in the samples may not reflect the full range of effluent concentration.

To account for this, EPA has developed a statistical approach to characterizing effluent variability when the monitoring dataset includes 10 or more samples.⁴ As “experience has shown that daily pollutant discharges are generally lognormally distributed,” TSD at App. E, EPA uses a lognormal

Ex. 5 Deliberative Process (DP)

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